



Ethyl Petroleum Additives
Sauget, Illinois 62201
(618) 274-4000

November 20, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dan Hopkins
On Scene Coordinator
United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Hopkins:

I have reviewed your letter of September 24, 1984, which included a draft response to the Ethyl Petroleum Additives, Inc. proposal for remedial investigation identified in paragraph 12C of Administrative Order V-W-84-007.

Tasks (i and ii)

Ethyl Petroleum Additives, Inc. has obtained the attached communication from Vernon N. Houk, Director for the Center for Environmental Health, which discusses the risks associated with 2, 3, 7, 8-TCDD soil contamination. The letter makes specific reference to:

"... industrial areas where children are seldom present and where extensive human contact with soil or dust is not likely to occur. A clean-up standard less stringent than 1 ppb could reasonably be considered. . . the levels proposed by Region II of 5 ppb for such areas (with a ceiling of 7 ppb) seem reasonable to us."

Further, the support document, "Health Implications of 2, 3, 7, 8-TCDD Contamination of Residential Soil" (attached) discusses commercial areas (p.037).

Commercial Areas

"At most commercial sites, parking lots and sidewalks are usually either paved or graveled, and exposure of the general population is transient and does not occur every day. Usually, children do not play in such areas for any length of time. In such situations, ingestion would be negligible, and inhalation and dermal exposure would be the primary routes. When concrete or gravel is involved, inhalation would also be negligible; thus, dermal absorption would be the primary exposure route. Since these total doses for all routes are so much smaller than in residential areas, a level of

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concern may not necessarily be reached unless levels are severalfold or more above 1 ppb. However, if concentrations are high or if there is a possibility of movement of soil or a dust problem, remedial measures (such as paving of the area) should be considered in any event. If levels are very high - e.g., above 100 ppb - more extensive remedial action may have to be considered."

The Ethyl Petroleum Additives, Inc. plant is an industrial site which is totally fenced and has limited access.

U.S. EPA Region V in paragraph 4 of its order in this matter, deferred to the Center for Disease Control (CDC) in matters regarding risk associated with 2, 3, 7, 8-TCDD soil contamination. Ethyl Petroleum Additives, Inc. asserts that the reasonable ceiling limit of at least 7 ppb, as proposed by CDC, be the goal for characterization of the extent of soil contamination.

U.S. EPA Region V previously agreed that the 18 third-round samples would satisfy the need for horizontal characterization of the extent of 2, 3, 7, 8-TCDD contamination at Ethyl Petroleum Additives, Inc. Previous data have identified only two areas in which the vertical extent of the 2, 3, 7, 8-TCDD should be characterized. Our proposal of June 25 addressed the need for further sampling in these two areas.

After reviewing the previous data, the CDC recommendations and the sampling proposed in Attachment Two of your letter of September 24, 1984, Ethyl Petroleum Additives, Inc. suggest the following additional sampling locations. Further iterations should be unnecessary.

Sample A	-	No Change
Sample B	-	No Change
Sample C	-	No Change
Sample D	-	This is the site of a previous sewer sample, and the proposed 5' core sample in Attachment Two is not feasible.
Sample E	-	Eliminate
Sample F	-	Sample to the 18" level as opposed to the 3' level proposed in Attachment Two.
Samples G - U	-	Eliminate

Task (iii)

Ethyl Petroleum Additives found no reference to samples from the sewer lines in attachments one or two other than the 5' core indicated in attachment two. We request further clarification of this section.

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Task (iv)

Should further information on surface water run-off be needed, Ethyl Petroleum Additives, Inc. proposes to perform an aerial survey at an appropriate scale and contour interval. We reiterate that the USGS 7.5 minute map is satisfactory for any normal assessment of water flow.

Ethyl Petroleum Additives, Inc. is currently attempting to ascertain the highest seasonal water level underlying the facility. When this information is available, it will be submitted.

Ethyl Petroleum Additives, Inc. by this letter is also requesting a conference with EPA to discuss the proposal. If you have any questions, please contact me.

Respectfully,



Sam McWilliams
Plant Manager

SM/bb

Attachments

No. 881446

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PS Form 3811, Mar. 1976

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Sam McWilliams

(Name of Sender)

Ethyl Petroleum Additives, Inc.

(Street or P.O. Box)

Sauget, IL 62201

(City, State, and ZIP Code)